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SC PUBLIC SERVICE  
COMMISSION

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2012-94-S

IN RE:

Application of Palmetto Wastewater  
Reclamation LLC d/b/a Alpine Utilities  
for adjustment of rates and charges  
for, and modification to certain terms  
and conditions related to  
the provision of sewer service.

DIRECT TESTIMONY  
OF  
MARION F. SADLER, JR.

1 Q. WOULD YOU PLEASE STATE YOUR FULL NAME AND PRESENT  
2 POSITION?

3 A. My name is Marion F. Sadler, Jr. I am retired from the South Carolina  
4 Department of Health and Environmental Control, or "DHEC," and provide  
5 environmental and utility consulting services in the State of South Carolina as a  
6 sole proprietorship that does business as "Sadler Environmental Assistance."  
7

8 Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

9 A. I received a Bachelor of Science degree in Mechanical Engineering from  
10 Clemson University in 1971. I received a Master of Engineering degree in  
11 Environmental Systems Engineering, also from Clemson University, in 1981.  
12  
13

1    **Q.    HOW LONG DID YOU WORK AT DHEC?**

2    **A.**            I worked at DHEC and one of its predecessor agencies for my entire  
3                   career, which was approximately 34 ½ years.

4  
5    **Q.    WOULD YOU PLEASE DESCRIBE YOUR WORK EXPERIENCE?**

6    **A.**            Yes.    I began working with the South Carolina Board of Health as an  
7                   Environmental Engineer Associate in July, 1971.    In this capacity I was the  
8                   District Director in the Lower Savannah District Office, which covered  
9                   Orangeburg, Bamberg, and Calhoun Counties, where I was responsible for the  
10                  field work of the water supply, domestic wastewater, and swimming pool  
11                  programs.

12                  In 1972, I transferred to the Domestic Wastewater Division in the main  
13                  Columbia office, where I was a plan reviewer of private wastewater collection  
14                  and treatment systems throughout South Carolina.

15                  In 1973, the South Carolina Pollution Control Authority, or "PCA," was  
16                  merged with the Board of Health and the combined agencies were re-formed as  
17                  DHEC.    As a result of that restructuring, I became District Director of the Central  
18                  Midlands Environmental Quality Control District Office, which covered  
19                  Richland, Lexington, Newberry, & Fairfield Counties.    In this capacity I was  
20                  responsible for the field work of the water supply, wastewater, and swimming  
21                  pool programs.

22                  In August of 1974, I became Section Manager of the Community Section  
23                  of the Domestic Wastewater Division, Bureau of Water Pollution Control for

1 DHEC. In this capacity I was responsible for permitting activities of domestic  
2 wastewater collection and treatment systems throughout the State of South  
3 Carolina, except for those owned by municipalities, counties, the federal  
4 government, and industries. In this position I supervised up to five (5) plan  
5 reviewers and was responsible for administering and developing the statewide  
6 program through regulations, program guidance memorandums, etc. I played a  
7 key role in the adoption of these items into SC Regulation 61-67, Standards for  
8 Wastewater Facility Construction. Also, I was involved in the development and  
9 promulgation of SC Regulation 61-82, Proper Closeout of Wastewater Treatment  
10 Facilities. In this capacity, I conducted numerous public hearings and testified in  
11 proceedings before courts and administrative bodies. During this time, I also  
12 testified in rate relief hearings before the Public Service Commission of South  
13 Carolina.

14 In September of 1991, I became Director of the Industrial, Storm Water,  
15 and Agricultural Permitting Division, which position I held until my retirement  
16 from DHEC in 2005. In that capacity I was responsible for the permitting  
17 activities of entities involved in the treatment or discharge of industrial  
18 wastewater, which included land appliers, direct dischargers, and pretreaters of  
19 non-domestic wastewater. The Storm Water Program I oversaw involved three  
20 separate permitting programs: the Industrial, Construction, and Municipal  
21 Separate Storm Sewer Systems (MS4s) program; the Agricultural program; and  
22 the Dams and Reservoirs Permitting program. In this position I supervised up to  
23 twenty six (26) staff members in four (4) sections and was responsible for

1 administering and developing these statewide programs through regulations,  
2 program guidance memorandums, etc. I was also responsible for implementation  
3 of the Federal National Pollutant Discharge Elimination Systems, or "NPDES,"  
4 component of these three state programs and I interfaced with the Federal agency  
5 charged with administering the NPDES program, the Environmental Protection  
6 Agency, or "EPA," in its oversight role. Further, I led and assisted in the  
7 development of regulations for these programs. I conducted public hearings,  
8 testified in court proceedings, made presentations to various concerned  
9 organizations, updated state regulations, and appeared before legislative  
10 committees on various issues. I also developed web pages and guidance  
11 documents for the program areas under my responsibility.

12  
13 **Q. WOULD YOU PLEASE DESCRIBE THE CONSULTING WORK YOU**  
14 **HAVE BEEN DOING SINCE YOU RETIRED FROM DHEC?**

15 A. Yes. I have worked with both governmental and private entities on  
16 environmental issues such as wastewater permit applications to DHEC, stream  
17 buffer ordinances, and NPDES permit matters. Most recently I have been  
18 retained to provide consulting services in connection with the application of  
19 Palmetto Wastewater Reclamation LLC, or "PWR," to this Commission for rate  
20 relief for the Alpine sewer system that it operates.

21  
22 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
23 **PROCEEDING?**

1 A. The purpose of my testimony is to describe the services I have performed  
2 relative to the proposed modification to the provisions of the PWR rate schedule  
3 to set commercial customer rates based on equivalencies to residential customers  
4 and to support its adoption by the Commission.

5  
6 **Q. WOULD YOU PLEASE DESCRIBE THE SERVICES YOU PROVIDED IN**  
7 **CONNECTION WITH THIS CASE?**

8 A. Yes. I was retained to analyze PWR's current commercial customer rate  
9 structure and to assist it in conducting a field survey of the commercial customers  
10 served by the Alpine sewer system. The primary purpose of the survey was to  
11 determine the type, size, and scope of the business conducted by each commercial  
12 customer. It was necessary to perform this survey to ascertain whether PWR  
13 should make a transition from its current commercial customer rate structure, that  
14 is partially based upon a PCA regulation that established wastewater loading  
15 guidelines using biochemical oxygen demand, or "BOD," to a commercial  
16 customer equivalency rating system that is consistent with the Unit Contributory  
17 Loading Guidelines set out in Appendix "A" of DHEC Regulation 61-67, which  
18 are based solely upon hydraulic flow and have been recognized by this  
19 Commission in rate designs for a number of public utilities providing wastewater  
20 service. Using the findings of the survey, the Company was able to determine the  
21 hydraulic loading factors applicable to each type of commercial customer under  
22 Appendix "A" of DHEC Regulation 61-67. The survey process also allowed the  
23 Company to identify commercial premises connected to the Alpine system which

1 did not have customer accounts established with the Company, verify existing  
2 business names and confirm the nature of the business being conducted at  
3 customer premises, and to cross check commercial customer locations against the  
4 Company's billing records.

5  
6 **Q. WOULD YOU PLEASE DISCUSS YOUR PREVIOUS SPECIFIC**  
7 **KNOWLEDGE OR EXPERIENCE THAT QUALIFIED YOU TO**  
8 **PROVIDE THE CONSULTING SERVICES IN THIS MATTER THAT**  
9 **YOU HAVE DESCRIBED?**

10 A. Yes. My knowledge and experience in this regard is both personal and  
11 professional. When I was employed in the Community Section of the Domestic  
12 Wastewater Division of DHEC, I was involved in the permitting of the Alpine  
13 Utilities wastewater treatment system and collection systems from the time it was  
14 built in the early 1970s. This involvement with the system lasted until I  
15 transferred to the Industrial, Agricultural, and Stormwater Permitting Division in  
16 1991. When Alpine Utilities was in the process of applying to the Public Service  
17 Commission for approval of rates, including rates for commercial customers, I  
18 was tasked with calculating the Five-Day BOD (BOD<sub>5</sub>) factors for the different  
19 types of establishments listed in the PCA's Unit Contributory Loadings guidance  
20 document. These factors were used in discussions between the agency and Mr.  
21 Donald Dial, the then President of Alpine Utilities, regarding the proposed rate  
22 structure for Alpine Utilities. The BOD factors would adjust the monthly service  
23 rates for commercial establishments based on flow and BOD loading (strength) of

1       their wastewater in relation to typical residential domestic wastewater. As the  
2       Commission is aware, it approved a commercial rate design for Alpine Utilities  
3       based upon the BOD<sub>5</sub> factors in its Order Number 18,862 issued December 5,  
4       1975.

5               When I worked in the Domestic Wastewater Division, I used the Unit  
6       Contributory Loading Guidelines (that later were adopted into DHEC Regulation  
7       61-67) for 18 years on a routine basis. Being responsible for the statewide  
8       permitting of all private wastewater systems, I personally reviewed and/or  
9       supervised the personnel who reviewed all of the wastewater plans that were  
10      submitted to DHEC for approval by Alpine Utilities' professional engineers on its  
11      behalf.

12             Also, since 1971 I have lived in the St. Andrews area where the Alpine  
13      service area is located. Because of this, I have patronized many of the  
14      commercial establishments in the area over the years. Therefore, I am very  
15      familiar with the service area and many of Alpine's customers on a professional  
16      and personal basis.

17             Finally, as Section Manager of the Community Section from 1974 to  
18      1991, I have testified before the Public Service Commission on numerous rate  
19      hearings for investor-owned wastewater utilities, including Alpine Utilities, with  
20      respect to the utilities' overall operation and maintenance of their wastewater  
21      systems and compliance with their NPDES Permits issued by DHEC.

1    **Q.     WOULD YOU PLEASE EXPLAIN HOW THE UNIT CONTRIBUTORY**  
2       **GUIDELINES IN APPENDIX "A" TO REGULATION 61-67 WERE**  
3       **DEVELOPED AND HOW THEY ARE CURRENTLY USED?**

4    A.       Yes. To understand this, I think it is important to first understand some of  
5       the background regarding the original Unit Contributory Loading Guidelines.  
6       The staff of the PCA developed the original Unit Contributory Loading  
7       Guidelines from a review it performed of wastewater text/reference books  
8       commonly used in the wastewater engineering and science field. From this  
9       review, the typical hydraulic (flow) loadings and organic (BOD<sub>5</sub>) loadings listed  
10      in the text books were established by the PCA staff for different types of  
11      commercial and industrial establishments, residential projects, schools, etc. These  
12      typical textbook loading factors were published in the early 1970s by the PCA as  
13      a guidance document for use by consulting engineers and their staff. The staff of  
14      the Board of Health, which included me and my staff, also utilized this document  
15      in our work since both agencies were required by state law to issue wastewater  
16      construction permits for proposed subdivisions with 250 or more lots. After the  
17      merger of these two agencies to form DHEC, the guidance document with both  
18      the hydraulic and organic loading rates was included in DHEC Regulation 61-67.  
19      Since then, DHEC has amended its Regulation 61-67 by removing the organic  
20      loading factor from the Unit Contributory Loadings given in Appendix "A" to the  
21      regulation. Copies of the original Unit Contributory Loading Guidelines  
22      developed by the PCA and the current guidelines contained in Appendix "A" to

1 DHEC Regulation 61-67 are attached to my testimony as Exhibits MFS-1 and  
2 MFS-2, respectively.

3  
4 **Q. IN YOUR OPINION, IS IT APPROPRIATE FROM AN ENGINEERING**  
5 **AND REGULATORY VIEWPOINT TO ELIMINATE THE BOD<sub>5</sub>**  
6 **FACTOR FROM THE RATE DESIGN CURRENTLY APPLIED TO**  
7 **PWR'S COMMERCIAL CUSTOMERS AND RELY UPON FLOW ALONE**  
8 **TO DETERMINE THE EQUIVALENCIES USED TO DETERMINE**  
9 **THEIR MONTHLY RATES?**

10 A. Yes, it is.

11  
12 **Q. WOULD YOU PLEASE EXPLAIN THE BASIS FOR YOUR OPINION IN**  
13 **THIS REGARD?**

14 A. Yes. I think it is appropriate for several reasons. First, the fact that DHEC  
15 has seen fit to modify the regulation so as to eliminate BOD<sub>5</sub> as a loading factor  
16 for wastewater treatment facilities means that the current rates for PWR  
17 commercial customers are based on engineering and regulatory guidelines that are  
18 no longer in force. I believe that consistency between pertinent regulations and  
19 the Company's rate schedule is desirable.

20 Second, since it has been owned by PWR, the Alpine system has been  
21 subjected to an aggressive program designed to prevent fats, oils, and grease from  
22 entering the system. The removal of these pollutants lowers the BOD of the  
23 wastewater from commercial establishments, primarily restaurants, that have

1 traditionally had more grease in their wastewater than they do today. Therefore,  
2 the BOD loading of these establishments is less today than the “text book” values  
3 established in the original Unit Contributory Loading Guidelines established by  
4 the PCA. The information on BOD loading rates in the original PCA guidelines  
5 is over 35 years old and that was likely a contributing factor in DHEC’s decision  
6 to eliminate BOD in the guidelines in current Appendix “A” to Regulation 61-67.

7 Also, as time has passed, the nature of commercial customers in the  
8 Alpine service area has changed such that they may not readily correspond to the  
9 types of establishment types found in the current rate schedule, which was based  
10 on the original loading guidelines promulgated by the PCA. This leads to  
11 uncertainty with respect to the BOD factor used in the default commercial rate  
12 calculation contained in the existing rate schedule that must be used for  
13 unspecified types of commercial customers. To resolve this uncertainty,  
14 judgments must be made with respect to the BOD loading factor that should be  
15 used. These judgments are, by nature, somewhat subjective and will most likely  
16 vary over time depending on the person making them. Therefore, as time goes by,  
17 these situations can lead to inconsistent rates for certain types of similarly situated  
18 commercial customers.

19 Finally, I am aware that most of the investor-owned wastewater utilities  
20 regulated by this Commission that have commercial customer rates designs  
21 employing equivalencies to residential customer rates, which would include  
22 PWR’s sister subsidiary Palmetto Utilities, Inc., have used flow alone as the basis  
23 for commercial customer rates with no consideration of the BOD factor.

1       Therefore, using only the hydraulic loading factor for determining commercial  
2       customers rate equivalencies will bring PWR's Alpine customer rate structure into  
3       line with most, if not all, of the public utilities providing wastewater service  
4       pursuant to rates authorized by the Commission.

5  
6       **Q.     DID YOU PARTICIPATE IN THE SURVEY OF COMMERCIAL**  
7       **CUSTOMERS THAT YOU MENTIONED?**

8       A.       Yes, I did.

9  
10      **Q.     WOULD YOU PLEASE PROVIDE THE DETAILS OF HOW THE**  
11      **COMMERCIAL CUSTOMER SURVEY WAS CONDUCTED?**

12     A.       Yes. The survey involved three separate phases. The first phase dealt  
13     with preparing for the actual field work. This commenced with PWR providing to  
14     me an electronic file containing a list of all commercial customers served by the  
15     Alpine system which included the name of the establishments and service  
16     addresses. The file listed restaurants and all other commercial customers  
17     separately. Also during the first phase, PWR developed two forms for use by the  
18     field survey team when conducting the physical inspection of commercial  
19     customer premises. One form was a "Commercial Customer Inspection Checklist"  
20     which was designed to capture basic customer information and document the  
21     particulars of the inspection. This form was also used to record the type of  
22     commercial establishment maintained by the customer and to capture information  
23     regarding the hydraulic loading factors from Appendix "A" of SC Regulation 61-

1       67 applicable to the type of establishment, grease trap and satellite sewer  
2       information where applicable, and any other pertinent information. A copy of this  
3       form is attached to my testimony as Exhibit MFS-3. The other form was a  
4       “Shopping Center Supplemental Inspection Checklist” developed for use when  
5       the commercial customer location was a shopping center with multiple tenants.  
6       This form was used to record the shopping center name, location address, exterior  
7       square footage, number of separate units in the shopping center, names of  
8       tenants/stores and tenant contact information, tenant establishment type, hydraulic  
9       loading factors from Appendix “A” of SC Regulation 61-67 based on the type of  
10      establishment, and outparcel information. A copy of this form is attached to my  
11      testimony as Exhibit MFS-4.

12             Also during the first phase, PWR developed a letter of introduction for the  
13      field survey team members to provide to commercial customers so that they  
14      would understand the nature of the survey and associated inspection. The letter  
15      asked for the cooperation of the commercial customers with the company  
16      representatives. At the same time PWR developed an information sheet on the  
17      right of access accorded public utilities under Commission regulations to inspect  
18      customer premises which could be provided to any customer that was hesitant to  
19      allow the inspection. Copies of both of these documents are attached to my  
20      testimony as Exhibits MFS-5 and MFS-6, respectively. All field survey team  
21      members were provided with utility contractor identification cards, which  
22      included photographs, to clearly and readily identify them as such to customers.

1           The last step in the first phase of the survey was to sort the electronic file  
2           of commercial customer locations by street number plus street so that the  
3           commercial customer location inspections could be conducted as efficiently as  
4           possible. The list of commercial customers was then divided up into three (3)  
5           parts to be assigned to the members of the field survey team.

6           The second phase of the survey was to conduct the actual inspections of,  
7           and gather information regarding, the commercial customer locations. The field  
8           survey team consisted of eight people which included Mr. Rick Melcher, Manager  
9           of Public Relations for Ni America Operating LLC, Mr. Tim Thornton, an  
10          inspector employed by Ni America Operating LLC in the grease removal and  
11          reduction program, five persons who provided contract services for the field  
12          survey project, and me. Prior to the field survey and inspections, PWR conducted  
13          a training session for all of the survey team members to explain how the survey  
14          and inspections were to be conducted; to instruct them in the use of the two  
15          inspection forms I described; to educate them with respect to the Unit  
16          Contributory Loadings in Appendix "A" of Regulation 61-67; and to describe to  
17          them how to apply the equivalency loading factors under Appendix "A" to  
18          Regulation 61-67 to commercial customers when filling out the inspection forms.  
19          The survey team members were instructed to be courteous, considerate of  
20          commercial customer representatives participating in the survey with respect to  
21          the time required of them and the operation of their businesses, and to conduct  
22          themselves in a professional manner. Also, a digital camera was provided to each

1 team to take pictures of the exterior and interior of the commercial customer  
2 premises if this was agreeable to the customer.

3 Three field teams of two people each were established. Mr. Melcher and I  
4 supervised the field surveys from a central location in the service area that was  
5 rented for that purpose. Meetings of the field survey teams were held in the  
6 morning each day prior to commencing inspections and at the end of each day  
7 when the completed survey forms were turned in and any issues that arose during  
8 the day were discussed. I also reviewed the completed surveys to make sure all  
9 necessary information had been obtained. If there were any questions on a  
10 completed survey it was discussed with the applicable team member and, if  
11 necessary, a follow-up inspection or telephone call to the commercial customer  
12 premises was made to resolve the question.

13 The commercial customer premises consisting of restaurants were  
14 inspected during the week of April 2 to April 6, 2012 by Mr. Melcher, Mr.  
15 Thornton and me. The remaining commercial customer premises were inspected  
16 by the other field survey team members on April 19 and 20, 2012, and during the  
17 week of April 23 to April 27, 2012. Additional follow-up inspections were made  
18 over the next two weeks on an as needed basis.

19 The third phase of the survey project involved the assimilation of the  
20 inspection and field survey results documentation and analysis of the information  
21 obtained. After the completion of all inspections, the completed forms were  
22 provided to PWR for its evaluation and use in developing a proposed rate design  
23 for commercial customers based upon equivalency ratings using hydraulic flows

1 consistent with Appendix "A" to DHEC Regulation 61-67. Single Family  
2 Equivalent (SFE) ratings were also calculated for each commercial customer  
3 using the loading guideline factors set out in Appendix "A" to Regulation 61-67.  
4

5 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

6 A. Yes, it does.

SCPCA-WDG-4

**GUIDELINES**  
**for**  
**UNIT CONTRIBUTORY LOADINGS**  
**to**  
**WASTEWATER TREATMENT FACILITIES**



**WATER POLLUTION CONTROL DIVISION**

*South Carolina*  
*Pollution Control Authority*  
1972

**SCPCA-WDG-4**  
**SOUTH CAROLINA**  
**POLLUTION CONTROL AUTHORITY**  
**Water Pollution Control Division**  
**Guidelines for**  
**Unit Contributory Loadings to Wastewater Treatment Facilities**

The following are guidelines for the *minimum* design loadings for waste treatment facilities. These guidelines will be used by the South Carolina Pollution Control Authority in evaluating proposed facilities.

<i>Type of Establishment</i>	<i>Gallons Per Day Per Person</i>	<i>Lbs. 5-Day BOD Per Day Per Person</i>
Airport — Each Employee .....	10	.06
— Each Passenger .....	5	.02
Apartments — 3 Bedroom 4 Persons Each .....	100	.17
— 2 Bedroom 3 Persons Each .....	100	.17
— 1 Bedroom 2 Persons Each .....	100	.17
— With Garbage Disposal Units .....	100	.23
Bars — Each Employee .....	10	.06
— Each Seat (Excluding Restaurant) .....	40	.01
Boarding House — Resident .....	50	.10
Bowling Alley — Per Lane (No Restaurant) .....	125	.20
— Additional For Bars and Cocktail Lounges .....	3	.02
Camps — Resort (Luxury) .....	100	.17
— Summer .....	50	.12
— Day (With Central Bathhouse) .....	35	.10
— Per Travel Trailer Site .....	175	.28
Churches — Per Seat .....	3	.02
Clinics — Per Staff .....	15	.03
— Per Patient .....	5	.02
Country Club — Each Member .....	50	.10
Factories — Each Employee (No Showers) .....	25	.06
— Each Employee (With Showers) .....	35	.08
— Each Employee (With Kitchen Facilities) ..	40	.10
Fairgrounds — Average Attendance .....	5	.03
Food Service Operations —		
Ordinary Restaurant (Not 24 Hours) (Per Seat) .....	70	.20
24-Hour Restaurant (Per Seat) .....	100	.30
Curb Service (Drive-in) (Per Car Space) .....	100	.20
Vending Machine Restaurant .....	70	.12

<i>Type of Establishment</i>	<i>Gallons Per Day Per Person</i>	<i>Lbs. 5-Day BOD Per Day Per Person</i>
Hospitals — Per Bed .....	200	.30
— Per Resident Staff .....	100	.17
Hotels — Per Bedroom (No Restaurant) .....	100	.17
Institutions — Per Resident .....	100	.17
Laundries — Self Service — Per Machine .....	400	.68
Mobile Homes — 3 Persons Each .....	100	.17
Motels — Per Unit (No Restaurant) .....	100	.17
Nursing Homes — Per Bed (No Laundry) .....	100	.17
— Per Bed (With Laundry) .....	150	.20
Offices — Per Person (No Restaurant) .....	25	.05
Picnic Parks — Average Attendance .....	10	.06
Residences — 4 Persons Each .....	100	.17
— With Garbage Disposal Units .....	100	.23
Rest Homes — Per Bed (No Laundry) .....	100	.17
— Per Bed (With Laundry) .....	150	.20
Schools — Per Person (No Showers, Gym, Cafeteria) .....	10	.04
— Per Person With Cafeteria (No Gym, Showers) .....	15	.05
— Per Person With Cafeteria, Gym & Showers .....	20	.06
Service Stations — Each Car Served .....	10	.06
— Each Car Washed .....	75	.03
— First Bay (Per Day) .....	1000	2.0
— Each Additional Bay (Per Day) .....	500	1.0
Shopping Centers — Per 1,000 Sq. Ft. Space (No Restaurant) .....	200	.40
Stadiums — Per Seat (No Restaurant) .....	2	.008
Swimming Pools — Per Person (With Sanitary Facilities and Showers) .....	10	.04
Theatres — Drive-In — Stall .....	5	.03
— Indoor — Seat .....	5	.03

Any major deviation from the above guidelines should be so noted and substantiated by the Engineer in the project report.

**DHEC Regulation 61-67, Appendix A****Unit Contributory Loadings to All Domestic Wastewater Treatment Facilities**

Type of Establishment	Hydraulic Loading (GPD)
A. Airport:	
1. Per Employee	10
2. Per Passenger	5
B. Apartments, Condominiums, Patio Homes:	
1. Three (3) Bedrooms (Per Unit)	400
2. Two (2) Bedrooms (Per Unit)	300
3. One (1) Bedroom (Per Unit)	200
C. Assembly Halls: (Per Seat)	5
D. Barber Shop:	
1. Per Employee	10
2. Per Chair	100
E. Bars, Taverns:	
1. Per Employee	10
2. Per Seat, Excluding Restaurant	40
F. Beauty Shop:	
1. Per Employee	10
2. Per Chair	125
G. Boarding House, Dormitory: (Per Resident)	50
H. Bowling Alley:	
1. Per Employee	10
2. Per Lane, No Restaurant, Bar or Lounge	125
I. Camps:	
1. Resort, Luxury (Per Person)	100
2. Summer (Per Person)	50
3. Day, with Central Bathhouse (Per Person)	35
4. Travel Trailer (Per Site)	175
J. Car Wash: (Per Car Washed)	75
K. Churches: (Per Seat)	3
L. Clinics, Doctor's Office:	
1. Per Employee	15
2. Per Patient	5
M. Country Club, Fitness Center, Spa: (Per Member)	50
N. Dentist Office:	
1. Per Employee	15
2. Per Chair	8
3. Per Suction Unit; Standard Unit	370
4. Per Suction Unit; Recycling Unit	95
5. Per Suction Unit; Air Generated Unit	0
O. Factories, Industries:	
1. Per Employee	25
2. Per Employee, with Showers	35
3. Per Employee, with Kitchen	40
4. Per Employee, with Showers and Kitchen	45
P. Fairgrounds: (Average Attendance, Per Person)	5
Q. Grocery Stores: (Per one thousand (1,000) Square Feet, No Restaurant)	200
R. Hospitals:	
1. Per Resident Staff	100
2. Per Bed	200
S. Hotels: (Per Bedroom, No Restaurant)	100
T. Institutions: (Per Resident)	100
U. Laundries: (Self Service, Per Machine)	400
V. Marinas: (Per Slip)	30
W. Mobile Homes: (Per Unit)	300
X. Motels: (Per Unit, No Restaurant)	100
Y. Nursing Homes:	
1. Per Bed	100
2. Per Bed, with Laundry	150
Z. Offices, Small Stores, Business, Administration Buildings: (Per Person, No Restaurant)	25
AA. Picnic Parks: (Average Attendance, Per Person)	10
BB. Prison/Jail:	
1. Per Employee	15
2. Per Inmate	125
CC. Residences: (Per House, Unit)	400

DD.	Rest Areas, Welcome Centers:	
1.	Per Person	5
2.	Per Person, with Showers	10
EE.	Rest Homes:	
1.	Per Bed	100
2.	Per Bed, with Laundry	150
FF.	Restaurants:	
1.	Fast Food Type, Not Twenty Four (24) Hours (Per Seat)	40
2.	Twenty Four (24) Hour Restaurant (Per Seat)	70
3.	Drive-In (Per Car Served)	40
4.	Vending Machine, Walk-up Deli (Per Person)	40
GG.	Schools, Day Care:	
1.	Per Person	10
2.	Per Person, with Cafeteria	15
3.	Per Person, with Cafeteria, Gym and Showers	20
HH.	Service Stations:	
1.	Per Employee	10
2.	Per Car Served	10
3.	Car Wash (Per Car Washed)	75
II.	Shopping Centers, Large Department Stores, Malls: (Per one thousand (1,000) Square Feet, No Restaurant)	200
JJ.	Stadiums, Coliseums: (Per Seat, No Restaurant)	5
KK.	Swimming Pools: (Per Person, with Sewer Facilities and Showers)	10
LL.	Theaters: Indoor (Per Seat), Drive In (Per Stall)	5

**ALPINE UTILITIES COMMERCIAL CUSTOMER INSPECTION CHECKLIST**

Customer Name: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

Service Address: \_\_\_\_\_  
\_\_\_\_\_

Name of Customer Representative Interviewed And Position:  
\_\_\_\_\_ (Name) \_\_\_\_\_ (Title)

Type of Establishment: \_\_\_\_\_ (Insert here alphabetic designation from list of establishments in Appendix A of R.61-67, A - LL, that best describes establishment. If more than one designation applies, or no designation applies, so note in next space. )

Notes: \_\_\_\_\_  
\_\_\_\_\_

Equivalency Factors: (Insert here hydraulic loading factors from Appendix A of R. 61-67 applicable to type of establishment; if more than one designation applies, provide factors for each designation.)  
\_\_\_\_\_  
\_\_\_\_\_

**GREASE TRAPS**

Grease Trap Present? Y / N (circle one) (If yes, note location at customer service premises: \_\_\_\_\_.)

Grease Trap Required? Y / N (circle one) (Where a grease trap is required, provide customer with a copy of the Alpine Fats, Oils and Grease standards.)

Grease Trap Condition: \_\_\_\_\_ (Insert here "poor, fair or good.")

Last pump date: \_\_\_\_\_

Grease Trap Comply with Alpine construction standards? Y / N (circle one)

Waste Oil Recycling at customer premises: Y / N

**SATELLITE SEWERS**

Satellite Sewer System Present? Y / N

Connection description: \_\_\_\_\_  
(For example, customer sanitary sewer collection system, stormwater, roof drain, sump pump, etc.)

Authorized connection: Y / N

System and Connection Condition: \_\_\_\_\_ Insert here "poor, fair or good."

Observed System or Connection Deficiencies: (Describe here any problems with connection or system.)  
\_\_\_\_\_  
\_\_\_\_\_

**OTHER**

Note here any other observations, questions or issues arising out inspection, including customer questions or comments.  
\_\_\_\_\_  
\_\_\_\_\_

**REVIEWED:** (Insert reviewer initials and date for each)

Operations: \_\_\_\_\_ Regulatory: \_\_\_\_\_

Accounting: \_\_\_\_\_ PR: \_\_\_\_\_

**CUSTOMER REQUESTED / PROVIDED COPY:** Y/N

**ALPINE UTILITIES SHOPPING CENTER SUPPLEMENTAL INSPECTION CHECKLIST**

Shopping Center Name: \_\_\_\_\_

Location Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Exterior Square Footage: \_\_\_\_\_ Measurement Method: \_\_\_\_\_ (Measuring wheel, tape, customer supplied,  
building records, tax records, etc.)

Number of Separate Units in Shopping Center: \_\_\_\_\_

Names of tenants/stores:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_

(If more than 8 separate tenants, attach separate sheet)

Tenant Contact Information:

- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

(If more than 8 separate tenants, attach separate sheet)

Tenant Type of Establishment:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_

(Insert here alphabetic designation from list of establishments in Appendix A of R.61-67, A - LL, that best describes establishment. If more than one designation applies, or no designation applies, so note in next space.)

(If more than 8 separate tenants, attach separate sheet)

Equivalency Factors: 

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_

(Insert here hydraulic loading factors from Appendix A of R. 61-67 applicable to type of tenant establishment; if more than one alphabetic designation applies, provide factors for each designation.)

(If more than 8 separate tenants, attach separate sheet)

Outparcel buildings on site? Y / N (circle one)

If yes, list all outparcel buildings by occupant name and confirm separate inspection performed by checking space below.

_____	Separate inspection _____
_____	Separate inspection _____
_____	Separate inspection _____
_____	Separate inspection _____

**REVIEWED:** (Insert reviewer initials and date.)

Operations: \_\_\_\_\_

Regulatory: \_\_\_\_\_

Accounting: \_\_\_\_\_

PR: \_\_\_\_\_

**CUSTOMER REQUESTED / PROVIDED COPY:**

Y / N



## Palmetto Wastewater Reclamation

Alpine and Woodland Utilities  
1710 Woodcreek Farms Road  
Elgin, SC 29045  
803-699-2422

April 2, 2012

Dear Customer:

As your wastewater utility, Palmetto Wastewater Reclamation, LLC-Alpine Utilities is conducting an inspection of your sewerage connections and premises for purposes of its upcoming rate relief proceeding before the Public Service Commission of South Carolina and ascertaining the applicability of and compliance with certain of our regulations and policies pertaining to commercial customer service locations.

The person bearing this letter is a duly authorized representative of Palmetto Wastewater Reclamation, LLC-Alpine Utilities and is authorized to inspect your premises under Public Service Commission regulation 103-537. We ask that you cooperate with our representative during this inspection, including providing information that may be requested.

We very much appreciate your cooperation in this matter. Should you have any questions or need additional information, please do not hesitate to contact me at the telephone number or email address shown below.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rick Melcher".

Rick Melcher  
Manager, Public Relations  
(979) 319-0966  
[rmelcher@niamerica.com](mailto:rmelcher@niamerica.com)

CHAPTER 103.

PUBLIC SERVICE COMMISSION

(Statutory Authority: 1976 Code Sections 58-3-140, 58-23-10, 58-23-590, 58-23-1010, and 58-23-1830)

**103-537. Right of Access.**

A. The authorized agents of the utility shall have the right of access to the customer's premises, at reasonable hours, for the purpose of inspecting the customer's sewerage connections and for any other purpose which is proper and necessary in the conduct of the utility's business.

B. When a sewerage line which is property of a utility is on the property of a resident in the utility's service area which is on file with the ORS, the resident shall provide reasonable access to the utility for maintenance thereof. Any damage done to the property by the utility shall be corrected by the restoration of comparable grass, shrubbery, and trees from nursery stock to conform with the condition before the maintenance process began.

HISTORY: Amended by State Register Volume 31, Issue No. 5, eff May 25, 2007.